

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARYANN WALKER,)	
)	
Plaintiff,)	
v.)	Case No.
)	
PILOT TRAVEL CENTERS, LLC)	Removal from the Circuit Court of Cook
)	County, Illinois
Defendant.)	

NOTICE OF REMOVAL

Defendant, PILOT TRAVEL CENTERS, LLC (“Pilot”), by its attorneys, Scott C. Bentivenga and Thomas M. Wolf of Lewis Brisbois Bisgaard & Smith LLP, and pursuant to 28 U.S.C. §1441, §1446 and §1332, hereby files its Notice of Removal of this cause to the United States District Court for the Northern District of Illinois from the Circuit Court of Cook County, Illinois. In support, Pilot states as follows:

1. On May 2, 2022, Plaintiff, MARYANN WAKER, filed an action in the Circuit Court of Cook County, Illinois, entitled *Maryann Walker v. Pilot Travel Centers, LLC.*, under case number 2022 L 004004. Attached as **Exhibit A** is a true and accurate copy of Plaintiff’s Complaint.
2. Pilot was served with a copy of the Complaint via a its registered agent on May 16, 2022 (See Ex. A), and brings this Notice of Removal within 30 days thereof.
3. Pilot asserts that the United States District Court for the Northern District of Illinois has diversity jurisdiction over this matter pursuant to 28 U.S.C. §1332, that this action is one which may be removed pursuant to 28 U.S.C. §1441, in that the parties, upon information and belief, are citizens of different states, and the amount in controversy, upon information and belief, exceeds the sum of \$75,000.

4. Pilot is a limited liability company organized and existing under the laws of the State of Delaware, with its principal place of business in Knoxville, Tennessee. The entirety of Pilot's LLC members are citizens of Knoxville, Tennessee. Based on information and belief, and after discussing this with Plaintiff's counsel, Plaintiff is a citizen of Illinois. Therefore, complete diversity exists as Plaintiff does not share a state of citizenship with Defendant.

5. In Plaintiff's Complaint, Plaintiff prays for judgment against Defendant in excess of \$50,000. Upon information and belief, Plaintiff is seeking damages in excess of \$75,000 as well. In Plaintiff's Complaint, Plaintiff alleges that as a result of the occurrence, Plaintiff suffered injuries both severe and permanent to multiple parts of her body, temporary and permanent disability, mental anguish, lost wages and incurred expenses for medical care and treatment. (Ex. A, Paragraph 7.) Therefore, the amount in controversy, upon information and belief, exceeds the sum of \$75,000.

6. Pilot is contemporaneously serving written notice of the filing of this Notice of Removal to the parties and the Clerk of the Circuit Court of Cook County, Illinois, pursuant to 28 USC §1446(d).

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Defendant Pilot Travel Centers, LLC, respectfully demands a jury trial on all triable issues in this action.

WHEREFORE, Defendant, Pilot Travel Centers, LLC, respectfully requests that this case proceed before the United States District Court for the Northern District of Illinois as an action properly removed.

Respectfully submitted,

/s/ Thomas M. Wolf

Scott C. Bentivenga (ARDC #: 6198298)

Thomas M. Wolf (ARDC # 6314294)

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Attorneys for Pilot Travel Centers, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing document was filed with the Clerk of the Court using the Court's CM/ECF system on this 14th day of June 2022, which will send electronic notification to the attorneys of records at the email addresses on file with the Court.

s/ Thomas M. Wolf

Thomas M. Wolf